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10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES
12
13

14 TODD MICHAEL SCHULTZ

15 Plaintiff
16

17 v.
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19 MICHAEL C. THOMPSON, GREGORY
20 R. HOLMES, and YOUTUBE LLC
21

22 Defendants.
23
24

Case No. 2:23-CV-03452-JAK-
MRWx

Hon. John A. Kronstadt

**OPPOSITION OF
DEFENDANTS MICHAEL C.
THOMPSON AND GREGORY
R. HOLMES TO PLAINTIFF'S
THIRD EX PARTE MOTION
FOR EXPEDITED HEARING**

Defendants Michael C. Thompson (“Thompson”) and Gregory R. Holmes (“Holmes”) hereby oppose the “Third Ex Parte Motion for Expedited Hearing” [Docket No. 55] (“Ex Parte”) filed by Plaintiff Todd Michael Schultz (“Plaintiff”) to the extent the Ex Parte purports to limit or affect the rights of Thompson and Holmes with respect to their pending motion to dismiss (“Motion”) [Docket No. 53]. Among other things, Thompson and Holmes are entitled to the full period under the Local Rules and the procedures of this Court to prepare, file and serve papers in reply to any opposition that Plaintiff may submit to their Motion. The Ex Parte does not set forth any good cause for limiting the rights of Thompson and Holmes or, for that matter, for asking the Court to deviate from its standard motion scheduling procedures. Thompson and Holmes set the Motion for hearing on the earliest date that was available on the Court’s calendar at the time they filed the Motion. If the Court nonetheless is inclined to set the Motion for hearing on an earlier date, Thompson and Holmes will not object so long as they have the full seven days, after service of any opposition that Plaintiff may submit to their Motion, to prepare, file and serve reply papers in support of their Motion.

Thompson and Holmes do not take any position on the Ex Parte to the extent it only concerns the pending motion filed by YouTube LLC [Docket No. 50].

DATED: August 1, 2023

LEVY, SMALL & LALLAS
A Partnership Including Professional
Corporations
TOM LALLAS
MARK D. HURWITZ

By: Mark Hurwitz
MARK D. HURWITZ
Attorneys for Defendants
Michael C. Thompson and
Gregory R. Holmes

**OPPOSITION OF DEFENDANTS MICHAEL C. THOMPSON AND
GREGORY R. HOLMES TO PLAINTIFF’S THIRD EX PARTE MOTION
FOR EXPEDITED HEARING**

PROOF OF SERVICE

Todd Michael Schultz vs. Michael C. Thompson, et al.

U.S. District Court – Central District, Case No. 2:23-CV-03452-JAK-MRWx

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 815 Moraga Drive, Los Angeles, California 90049.

On August 1, 2023, I served the foregoing document described as: **OPPOSITION OF DEFENDANTS MICHAEL C. THOMPSON AND GREGORY R. HOLMES TO PLAINTIFF’S THIRD EX PARTE MOTION FOR EXPEDITED HEARING** on all interested parties in this action ☒ by placing a true copy ☐ by placing true copies thereof enclosed in sealed envelopes addressed as shown on the below service/mailling list in the manner indicated below:

☒ **(BY SERVICE OF COURT VIA NOTICE OF ELECTRONIC FILING (“NEF”))** Pursuant to controlling General Order(s), the foregoing document will be served by the Court via NEF and hyperlink to the document. I checked the CM/ECF docket for this action and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email addresses indicated below.

- Todd Michael Schultz
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West Hollywood, CA 90069
toddschultz86@gmail.com

Plaintiff in propria persona

Conor Tucker, Esq.
Wilson Sonsini Goodrich & Rosati
1900 Avenue of the Stars, Suite 2800
Los Angeles, California 91356
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Attorneys for YouTube LLC

☒ **(FEDERAL)** I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 1, 2023, at Los Angeles, California.

/s/Mark D. Hurwitz
Mark D. Hurwitz

**OPPOSITION OF DEFENDANTS MICHAEL C. THOMPSON AND
GREGORY R. HOLMES TO PLAINTIFF’S THIRD EX PARTE MOTION
FOR EXPEDITED HEARING**